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ATTORNEYS FOR PLAINTIFF

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED HERITAGE CO. LTD.,

Plaintiff,

v.

GARY SHIRNYAN AKA IGOR SEYRANOV

Defendants.

Case No. 20-cv-00102

**MOTION FOR DEFAULT
JUDGMENT**

COMES NOW Plaintiff United Heritage Co. LTD. (“United Heritage”) and pursuant to the provisions of F.R.C.P. 55(b)(1) and hereby moves the Clerk for entry of Default Judgment against the Defendant Gary Shirnyan AKA Igor Seyranov on the following grounds:

1. Plaintiff United Heritage filed a Complaint for breach of express contract, fraud, breach of implied covenant of good faith and fair dealing, unjust enrichment (“Complaint”) in the United States District Court for the District of Wyoming on June 10, 2020, against Defendant Gary Shirnyan AKA Igor Seyranov.

2. Copies of the Complaint and Summons were served at the usual place of abode of Gary Shirnyan AKA Igor Seyranov on July 29, 2020 at 7:01 pm at 27673 Weeping Willow Drive, Valencia, CA 91354. The Complaint and Summons were left with Yuri Doe, who is the brother of Gary Shirnyan AKA Igor Seyranov and whose age is 18 years or older.
3. Gary Shirnyan AKA Igor Seyranov has failed to plead or otherwise defend.
4. The time allowed by law to plead or otherwise defend has expired.
5. On September 3, 2020, pursuant to Fed. R. Civ. P. 55 (a), the Clerk of Court properly entered default against Gary Shirnyan AKA Igor Seyranov for failure to appear or defend. [Doc. 16]
6. Because Gary Shirnyan AKA Igor Seyranov is in default, it is appropriate for the Court to enter Default Judgment against Gary Shirnyan AKA Igor Seyranov as prayed for in the Complaint. Thus, United Heritage requests the Court to enter Default Judgment in favor of United Heritage against Gary Shirnyan AKA Igor Seyranov, in the principal sum of five hundred thirteen thousand one hundred thirty-five dollars and seventy-nine cents (\$513,135.79), as well as post-judgment interest at the statutory rate of 10% per annum from the date of judgment until satisfaction.
7. Pursuant to Fed. R. Civ. P. 55(b)(1), there is filed contemporaneously herewith and incorporated herein by this reference the Affidavit of Egor Chernov, CEO of United Heritage, in support of the amount claimed by United Heritage.
8. Because United Heritage's claim is for a sum certain or a sum that can be made certain by computation, United Heritage is entitled to have Default Judgment entered against Gary Shirnyan AKA Igor Seyranov by the Clerk of Court, or the Court as appropriate, in the sum of five hundred thirteen thousand one hundred thirty-five dollars and seventy-nine cents (\$513,135.79), plus post-judgment interest as allowed by law.

WHEREFORE, United Heritage Co. LTD. respectfully moves the Clerk to enter Default Judgment against Defendant Gary Shirnyan AKA Igor Seyranov for the relief stated in the Complaint in the form of the proposed Default Judgment.

DATED: September 22, 2020.

Respectfully submitted,

/s/ Alexey V. Tarasov

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